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Attorneys for Defendant BlendJet Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

BLENDTEC INC., a Utah corporation,
Plaintiff,
vs.

BLENDJET INC., a Delaware corporation,
Defendant.

**BLENDJET’S MOTION FOR LEAVE TO
FILE DOCUMENTS UNDER SEAL**

Civil No. 2:21-cv-00668-TC-DBP
Judge Tena Campbell
Magistrate Judge Dustin B. Pead

Defendant BlendJet, Inc., pursuant to DUCivR 5-3 and the Standard Protective Order that applies in all civil cases in the U.S. District Court for the District of Utah, hereby moves this Court for leave to file under seal an unredacted version of the following document:

- BlendJet’s Objections to New Evidence Submitted by Blendtec in Connection with its Reply in Support of its Motion to Enforce the Protective Order

Good cause exists to file this document under seal because it recites information that has been designated as CONFIDENTIAL INFORMATION—ATTORNEYS’ EYES ONLY pursuant to the Standard Protective Order by BlendJet and therefore contain non-public and sensitive information that, if publicly disclosed, could cause BlendJet competitive harm. *See* DUCivR 26-2; DUCivR 5-3(b)(2)(C)(i).

Accordingly, BlendJet respectfully requests that the Court enter an Order restricting public access to and/or sealing the foregoing document.

Respectfully submitted this 6th day of June, 2023.

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

/s/ Martin R. Bader

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an electronic notification to counsel of record for all parties, including the following:

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/s/ Martin R. Bader